

**McMANIMON, SCOTLAND & BAUMANN, LLC**

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*Counsel for Daryl Fred Heller*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

DARYL FRED HELLER,

Debtor.

Prestige Fund A, LLC, *et al.*

Plaintiff,

v.

DARYL HELLER and HELLER CAPITAL  
GROUP, LLC,

Defendants.

Chapter 11

Case No. 25-11354 (JNP)

Adv. Pro. No. 25-01128

**Removed from:**

IN THE COURT OF COMMON PLEAS  
OF LANCASTER COUNTY, PA

CASE NO. CI-25-00491

**SUBMISSION OF RECORDS PURSUANT TO D.N.J. LBR 9027-1(c)**

On January 24, 2025, the action captioned, Prestige Fund A, LLC; Prestige Fund A II, LLC; Prestige Fund A IV, LLC; Prestige Fund A V, LLC; Prestige Fund A VI, LLC; Prestige Fund A VII, LLC; Prestige Fund A IX, LLC; Prestige Fund B, LLC; Prestige Fund B II, LLC; Prestige Fund B IV, LLC; Prestige Fund B V, LLC; Prestige Fund B VI, LLC; Prestige Fund B VII, LLC; Prestige Fund B BTM I, LLC; Prestige Fund D, LLC; Prestige Fund D III, LLC; Prestige Fund D IV, LLC; Prestige Fund D V, LLC; Prestige Fund D VI, LLC; Prestige Fund D BTM I, LLC; WF Velocity I, LLC; WF Velocity Fund IV, LLC; WF Velocity Fund V, LLC; WF Velocity Fund VI, LLC; and WF Velocity Fund VII, LLC v. Daryl Heller and Heller Capital Group, LLC, Case No. CI-25-00491, pending In the Court of Common Pleas of Lancaster

County, PA (the “PA Action”) was removed by the filing of a Notice of Removal by Daryl Fred Heller, chapter 11 debtor and debtor-in-possession (“Debtor”) pursuant to Title 28 of the United States Code, Sections 1334(b) and 1452(a), Federal Rule of Bankruptcy Procedure 9027 and D.N.J. LBR- 9027-1(a). Pursuant to D.N.J. LBR 9027-1(c), the Debtor hereby submits the following records filed in the Action:

1. Annexed hereto as **Exhibit A** is a copy of the docket for the PA Action.
2. Annexed hereto as **Exhibit B** is a copy of the Complaint filed by Prestige Fund A, LLC; Prestige Fund A II, LLC; Prestige Fund A IV, LLC; Prestige Fund A V, LLC; Prestige Fund A VI, LLC; Prestige Fund A VII, LLC; Prestige Fund A IX, LLC; Prestige Fund B, LLC; Prestige Fund B II, LLC; Prestige Fund B IV, LLC; Prestige Fund B V, LLC; Prestige Fund B VI, LLC; Prestige Fund B VII, LLC; Prestige Fund B BTM I, LLC; Prestige Fund D, LLC; Prestige Fund D III, LLC; Prestige Fund D IV, LLC; Prestige Fund D V, LLC; Prestige Fund D VI, LLC; Prestige Fund D BTM I, LLC; WF Velocity I, LLC; WF Velocity Fund IV, LLC; WF Velocity Fund V, LLC; WF Velocity Fund VI, LLC; and WF Velocity Fund VII, LLC (the “Plaintiffs”) on January 24, 2025.
3. Annexed hereto as **Exhibit C** is a copy of the Praeclipe to Reinstate Complaint filed by the Plaintiffs on February 28, 2025.
4. Annexed hereto as **Exhibit D** is the Proof of Service regarding the Complaint filed by the Plaintiffs on March 21, 2025.

**MCMANIMON, SCOTLAND  
& BAUMANN, LLC**  
*Counsel for Daryl Fred Heller*

Dated: March 25, 2025

By: /s/ Sari B. Placona  
Sari B. Placona